

***IN THE DISTRICT COURT OF THE UNITED STATES
For the Western District of New York***

**APRIL 2014 GRAND JURY
(Impaneled 04/15/14)**

THE UNITED STATES OF AMERICA

INDICTMENT

-VS-

WILLIE HARRIS

Violations:

21 U.S. C. §§ 841(a)(1) and 856(a)(1);
18 U.S.C. § 922(g)(1); and 26 U.S.C.
§§ 5861(c) and 5861(d)

(5 counts and Forfeiture Allegation)

COUNT 1

(Possession of Cocaine With Intent to Distribute)

The Grand Jury Charges That:

On or about June 10, 2014, in the Western District of New York, the defendant, **WILLIE HARRIS**, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 2

**(Use of Premises to Manufacture, Distribute
and Use a Controlled Substance)**

The Grand Jury Further Charges That:

On or about June 10, 2014, in the Western District of New York, the defendant, **WILLIE HARRIS**, did knowingly, intentionally and unlawfully use and maintain a place,

that is, the premises at 49 Troup Street, Apartment 21, Rochester, New York, for the purpose of manufacturing, distributing and using cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 3

(Felon in Possession of Firearms and Ammunition)

The Grand Jury Further Charges That:

On or about June 10, 2014, in the Western District of New York, the defendant, **WILLIE HARRIS**, having been convicted on or about May 1, 2003, in Supreme Court, Monroe County, New York, and on or about August 28, 1995, in County Court, Monroe County, New York, and on or about the April 7, 1993, in County Court, Monroe County, New York, of crimes punishable by imprisonment for a term exceeding one year, each a violent felony or a serious drug offense committed on occasions different from one another, unlawfully did knowingly possess, in and affecting commerce, a firearm, namely, (1) 12 gauge, Mossberg 500A slide action shotgun, bearing serial number P775429, and ammunition, namely, six (6) 12 gauge shotgun shells (Remington).

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT 4

(Possession of Short-Barreled Shotgun)

The Grand Jury Further Charges That:

On or about June 10, 2014, in the Western District of New York, the defendant, **WILLIE HARRIS**, did knowingly possess a firearm, that is, a short-barreled shotgun, being

more fully described as a Mossberg 500A slide action, 12 gauge shotgun, bearing serial number P775429, with a barrel length of less than 18 inches, made in violation of Chapter 53 of Title 26, United States Code.

All in violation of Title 26, United States Code, Sections 5822, 5845(a), 5861(c) and 5871.

COUNT 5

(Possession of an Unregistered Short-Barreled Shotgun)

The Grand Jury Further Charges That:

On or about June 10, 2014, in the Western District of New York, the defendant, **WILLIE HARRIS**, knowingly possessed a firearm, that is, a short-barreled shotgun, being more fully described as a Mossberg 500A slide action, 12 gauge shotgun, bearing serial number P775429, having a barrel less than 18 inches in length, not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5841, 5845(a), 5861(d) and 5871.

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of any of the offenses alleged in this Indictment, the defendant, **WILLIE HARRIS**, shall forfeit to the United States, all of his right, title and interest in any firearms and ammunition involved or used in the commission of the offense, or found in the

possession or under the immediate control of the defendant at the time of arrest including, but not limited to:

- a) one (1) 12 gauge, Mossberg 500A slide action shotgun, bearing serial number P775429; and
- b) ammunition, namely, six (6) 12 gauge shotgun shells (Remington).

All pursuant to the provisions of Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

DATED: Rochester, New York, September 16, 2014.

WILLIAM J. HOCHUL, JR.
United States Attorney

By: s/CHARLES E. MOYNIHAN
Assistant U.S. Attorney
United States Attorney's Office
Western District of New York
100 State Street, Suite 500
Rochester, New York 14614
(585) 399-3971
charles.moynihan@usdoj.gov

A TRUE BILL:

s/FOREPERSON